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November 3, 2022

Via ECF

Honorable Michael A. Shipp
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Courtroom 5W
Trenton, NJ 08608

Honorable Tonianne J. Bongiovanni
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Courtroom 6E
Trenton, NJ 08608

**Re: AC&S Asbestos Settlement Trust v. Aldrich Pump LLC, *et al.*,
Case No. 22-05116-MAS-TJB**

Dear Judges Shipp and Bongiovanni:

This firm is co-counsel to Aldrich Pump LLC and Murray Boiler LLC, respondents in the above referenced action (“Respondents”). Before the Court are (i) motions to quash the subpoenas [ECF Nos. 1, 5, 13] (together, the “Motions to Quash”) served on the Trusts,¹ Verus Claims Services, LLC, and Certain Matching Claimants, (ii) Certain Matching Claimants’ motion to proceed anonymously [ECF No. 14] (the “Motion to Proceed”), and (iii) Respondents’ motion to transfer to the United States Bankruptcy Court for the Western District of North Carolina [ECF No. 20] (the “Motion to Transfer” and together with the Motions to Quash and Motion to Proceed, the “Motions”).

Pursuant to the Letter Order dated September 21, 2022 [ECF No. 26], the Motions have been assigned to Judge Bongiovanni and the return date for the Motions is November 7, 2022. A review of the docket indicates that the Motions are to be heard on the papers. Respondents see no need to request oral argument on the Motion to Transfer. However, in the event the Motions to Quash and Motion to Proceed are not transferred to the North Carolina Bankruptcy Court,

¹ The “Trusts” are, collectively, AC&S Asbestos Trust, Combustion Engineering 524(g) Asbestos PI Trust, G-I Holdings Inc. Asbestos Personal Injury Settlement Trust, GST Settlement Facility, Kaiser Aluminum & Chemical Corp. Asbestos Personal Injury Trust, Quigley Asbestos Trust, THAN Asbestos Personal Injury Trust, and Yarway Asbestos Personal Injury Trust.

Respondents request that this Court hear oral argument on those motions and hold an evidentiary hearing with respect to the Motions to Quash. If such arguments and hearing were to be set, Respondents would ask for at least two weeks' notice of the date selected by the Court in order that Respondents can ensure the attendance of necessary witnesses.

Please do not hesitate to contact me should you have any questions. We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Paul R. DeFilippo

Paul R. DeFilippo

cc: Counsel of Record (via ECF)